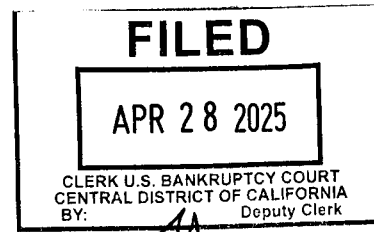


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Attorneys for Defendant
Genesis Equity Group Funding LLC



UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION

In re

THE LITIGATION PRACTICE GROUP,
P.C.,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. No. 8-25-ap-01105-SC

**DEFENDANT GENESIS EQUITY GROUP
FUNDING LLC'S ANSWER TO TRUSTEE'S
COMPLAINT FOR:**

**(1) AVOIDANCE, RECOVERY, AND
PRESERVATION OF 2-YEAR ACTUAL
FRAUDULENT TRANSFERS;**

**(2) AVOIDANCE, RECOVERY, AND
PRESERVATION OF 2-YEAR
CONSTRUCTIVE FRAUDULENT
TRANSFERS;**

**(3) DEMAND FOR ACCOUNTING AGAINST
WORLD GLOBAL FUND, LLC,
OPTIMUMBANK HOLDINGS INC.,
OPTIMUMBANK, AND
OPTIMUMBANK.COM;**

1 RICHARD A. MARSHACK, Trustee of the
2 LPG Liquidation Trust,

3 Plaintiff,

4 vs.

5 WORLD GLOBAL FUND, LLC; WORLD
6 GLOBAL FUND, LLC, D/B/A
7 BRICKSTONE GROUP, D/B/A SLATE
8 ADVANCE, D/B/A GREENTREE
9 ADVANCE, D/B/A SAFE VAULT, D/B/A
10 PSF, D/B/A LPG, D/B/A BRAUFMAN
11 AND ASSOCIATES, D/B/A WEINMAN
12 AND ASSOCIATES, D/B/A DORCY AND
13 WHITNEY, D/B/A KINGDOM CAPITAL,
14 D/B/A PRIME FUNDING GRP, D/B/A
15 GOLDCREST, D/B/A PARKSIDE
16 CAPITAL, D/B/A MNS FUNDING, D/B/A
17 KINGCASH, D/B/A W.B. FUND, D/B/A
18 WGF CAPITAL, D/B/A TOT CAPITAL,
19 D/B/A EVERYDAY GROUP, D/B/A
20 CRYSTAL SPRINGS, D/B/A VERTEX
21 CAPITAL, D/B/A FD FUND, D/B/A
22 HYBRID ADVANCE, D/B/A RAPID CAP,
23 D/B/A AY FUNDING, D/B/A COAST
24 PROCESSING LLC, D/B/A VULCAN
25 CONSULTING GROUP, D/B/A
26 GATEWAY FUNDING, D/B/A SUPREME
27 FUNDING; SHIA DEMBITZER;
28 SOLOMON FEIG; MOISHE GUBIN;
OPTIMUMBANK HOLDINGS, INC.;
OPTIMUMBANK;
OPTIMUMBANK.COM; LPG CAPITAL
LLC; LPG HOLDINGS LLC; MNS
FUNDING LLC, D/B/A LEGAL FEES
NETWORK, D/B/A THE GENESIS
EQUITY GROUP; SSD INVESTMENT
GROUP LLC; BRICKSTONE GROUP
LTD.; WGF CAPITAL INC.; PSF 2020
INC.; PSF, LLC; SUPREME ADVANCE
LLC; SLATE ADVANCE LLC; SAFE
VAULT CAPITAL LLC; GOLDCREST
ASSOCIATES LLC; PARKSIDE
CAPITAL GROUP LLC; HYBRID
ADVANCE LLC; EOM BUSINESS
CAPITAL LLC; GENESIS EQUITY
GROUP FUNDING LLC; EVERYDAY

(4) TURNOVER OF ESTATE PROPERTY;

**(5) FRAUD AND/OR CONVERSION/THEFT
COMMITTED BY WORLD GLOBAL, LLC,
DEMBITZER, FEIG, THE ALTER EGOS, AND
THE DEMBITZER ALTER EGOS – THE
FRAUDULENT ACH TRANSACTIONS;**

**(6) FRAUD AND/OR CONVERSION/THEFT
COMMITTED BY WORLD GLOBAL, LLC,
DEMBITZER, FEIG, THE ALTER EGOS, AND
THE DEMBITZER – UNREIMBURSED FUNDS
FROM THE MCA AGREEMENTS**

**(7) AIDING AND ABETTING FRAUD AND/OR
CONVERSION/THEFT BY MOISHE GUBIN,
OPTIMUMBANK HOLDINGS INC.,
OPTIMUMBANK, OPTIMUMBANK.COM;**

**(8) AIDING AND ABETTING BY MOISHE
GUBIN, OPTIMUMBANK HOLDINGS INC.,
OPTIMUMBANK, OPTIMUMBANK.COM;
AND**

(9) CONSPIRACY TO COMMIT FRAUD

Complaint Filed: March 10, 2025
The Honorable Scott C. Clarkson

1 GROUP LLC; WORLD GLOBAL FUND;
2 WORLD GLOBAL LLC, N/K/A GLASS
3 MEDIA, LLC; FUNDING GATEWAY
4 INC.; FUNDING GATEWAY INC.;
5 FUNDING GATEWAY INC. D/B/A
6 WEINMAN AND ASSOCIATES; COAST
7 PROCESSING LLC; VERTEX CAPITAL
8 (US) FUNDING LLC; VERTEX CAPITAL
9 PARTNERS LLC; CRYSTAL SPRINGS
10 CAPITAL LLC; and WEINMAN AND
11 ASSOCIATES LLC,

Defendants.

12 Defendant Genesis Equity Group Funding LLC, hereby answers Plaintiff's Complaint for: (1)
13 Avoidance, Recovery, and Preservation of 2-Year Actual Fraudulent Transfers; (2) Avoidance,
14 Recovery, and Preservation of 2-Year Constructive Fraudulent Transfers; (3) Demand for
15 Accounting Against World Global Fund, LLC, OptimumBank Holdings Inc., OptimumBank, and
16 OptimumBank.com; (4) Turnover of Estate Property; (5) Fraud and/or Conversion/Theft committed
17 by World Global, LLC, Dembitzer, Feig, The Alter Egos, and The Dembitzer – Unreimbursed Funds
18 from the ACH Transactions; (6) Fraud and/or Conversion/Theft committed by World Global, LLC,
19 Dembitzer, Feig, The Alter Egos, and The Dembitzer – Unreimbursed Funds from the MCA
20 Agreements; (7) Aiding and Abetting Fraud and/or Conversion/Theft by Moishe Gubin,
21 OptimumBank Holdings Inc., OptimumBank, and OptimumBank.com; and (9) Conspiracy to
22 Commit Fraud" (the "Complaint") [Docket No. 1] and admit, deny, and aver as follows:

STATEMENT OF JURISDICTION, NATURE OF PROCEEDING, AND VENUE

23 1. The allegations of Paragraph 1 of the Complaint do not require an answer. To the
24 extent an answer is required, Defendant lacks sufficient information to admit or deny the allegations
25 in this paragraph and, on that basis, denies them.

26 2. The allegations of Paragraph 2 of the Complaint do not require an answer. To the
27 extent an answer is required, Defendant lacks sufficient information to admit or deny the allegations
28 in this paragraph and, on that basis, denies them.

3. Answering Paragraph 3 of the Complaint, Defendant responds that the statements are assertions of law, not allegations of fact, and do not require a response. To the extent an answer is required, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them. Further, Defendant does not consent to entry of a final order or judgment by the bankruptcy court.

4. Answering Paragraph 4 of the Complaint, Defendant responds that the statements are assertions of law, not allegations of fact, and do not require a response. To the extent an answer is required, Defendant denies the allegations in Paragraph 4.

THE PARTIES

5. Answering Paragraph 5 of the Complaint, Defendant admits that Richard A. Marshack is the duly appointed, qualified, and acting chapter 11 trustee for the estate of the debtor and the current liquidating trustee of the LPG liquidating trust. Defendant lacks sufficient information to admit or deny the remaining allegations in this paragraph and, on that basis, denies them.

6. Answering Paragraph 6 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

7. Answering Paragraph 7 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

8. Answering Paragraph 8 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

9. Answering Paragraph 9 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

10. Answering Paragraph 10 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

11. Answering Paragraph 11 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

12. Answering Paragraph 12 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

1 13. Answering Paragraph 13 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 14. Answering Paragraph 14 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 15. Answering Paragraph 15 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 16. Answering Paragraph 16 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 17. Answering Paragraph 17 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 18. Answering Paragraph 18 of the Complaint, Defendant lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 19. Answering Paragraph 19 of the Complaint, Defendant denies authorizing MNS
14 Funding LLC to operate under its name or otherwise being associated with the operations of MNS
15 Funding LLC, and otherwise lacks sufficient information to admit or deny the allegations in this
16 paragraph and, on that basis, denies them.

17 20. Answering Paragraph 20 of the Complaint, Defendant lacks sufficient information to
18 admit or deny the allegations in this paragraph and, on that basis, denies them.

19 21. Answering Paragraph 21 of the Complaint, Defendant lacks sufficient information to
20 admit or deny the allegations in this paragraph and, on that basis, denies them.

21 22. Answering Paragraph 22 of the Complaint, Defendant lacks sufficient information to
22 admit or deny the allegations in this paragraph and, on that basis, denies them.

23 23. Answering Paragraph 23 of the Complaint, Defendant lacks sufficient information to
24 admit or deny the allegations in this paragraph and, on that basis, denies them.

25 24. Answering Paragraph 24 of the Complaint, Defendant lacks sufficient information to
26 admit or deny the allegations in this paragraph and, on that basis, denies them.

27 25. Answering Paragraph 25 of the Complaint, Defendant lacks sufficient information to
28 admit or deny the allegations in this paragraph and, on that basis, denies them.

1 26. Answering Paragraph 26 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 27. Answering Paragraph 27 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 28. Answering Paragraph 28 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 29. Answering Paragraph 29 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 30. Answering Paragraph 30 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 31. Answering Paragraph 31 of the Complaint, Defendant lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 32. Answering Paragraph 32 of the Complaint, Defendant admits the allegations contained
14 therein.

15 33. Answering Paragraph 33 of the Complaint, Defendant lacks sufficient information to
16 admit or deny the allegations in this paragraph and, on that basis, denies them.

17 34. Answering Paragraph 34 of the Complaint, Defendant lacks sufficient information to
18 admit or deny the allegations in this paragraph and, on that basis, denies them.

19 35. Answering Paragraph 35 of the Complaint, Defendant lacks sufficient information to
20 admit or deny the allegations in this paragraph and, on that basis, denies them.

21 36. Answering Paragraph 36 of the Complaint, Defendant lacks sufficient information to
22 admit or deny the allegations in this paragraph and, on that basis, denies them.

23 37. Answering Paragraph 37 of the Complaint, Defendant lacks sufficient information to
24 admit or deny the allegations in this paragraph and, on that basis, denies them.

25 38. Answering Paragraph 38 of the Complaint, Defendant lacks sufficient information to
26 admit or deny the allegations in this paragraph and, on that basis, denies them.

27 39. Answering Paragraph 39 of the Complaint, Defendant lacks sufficient information to
28 admit or deny the allegations in this paragraph and, on that basis, denies them.

1 40. Answering Paragraph 40 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 41. Answering Paragraph 41 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 42. Answering Paragraph 42 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 43. Answering Paragraph 43 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 **RELEVANT DEFENDANT NAMED IN 1046 ACTION**

10 44. Answering Paragraph 44 of the Complaint, Defendant lacks sufficient information to
11 admit or deny the allegations in this paragraph and, on that basis, denies them.

12 **GENERAL ALLEGATIONS**

13 **A. LPG'S BANKRUPTCY CASE**

14 45. Answering Paragraph 45 of the Complaint, Defendant admits that Debtor filed a
15 voluntary petition for relief under Chapter 11 of the Bankruptcy Code, commencing the Bankruptcy
16 Case. Defendant lacks sufficient information to admit or deny the remaining allegations in this
17 paragraph and, on that basis, denies them.

18 46. Answering Paragraph 46 of the Complaint, Defendant admits the allegations contained
19 therein.

20 47. Answering Paragraph 47 of the Complaint, Defendant admits the allegations contained
21 therein.

22 48. Answering Paragraph 48 of the Complaint, Defendant admits the allegations contained
23 therein.

24 49. Answering Paragraph 49 of the Complaint, Defendant lacks sufficient information to
25 admit or deny the allegations in this paragraph and, on that basis, denies them.

26 50. Answering Paragraph 50 of the Complaint, Defendant lacks sufficient information to
27 admit or deny the allegations in this paragraph and, on that basis, denies them.

28 ///

B. LPG

51. Answering Paragraph 51 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

52. Answering Paragraph 52 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

53. Answering Paragraph 53 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

54. Answering Paragraph 54 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

55. Answering Paragraph 55 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

56. Answering Paragraph 56 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

57. Answering Paragraph 57 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

58. Answering Paragraph 58 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

59. Answering Paragraph 59 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

60. Answering Paragraph 60 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

61. Answering Paragraph 61 of the Complaint, Defendant denies the allegations that “money [] flowed from Debtor . . . to Defendants,” and that “Debtor [] made deposits into these entities’ bank accounts,” to the extent that Defendant is included in that allegations, and otherwise lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

///

///

C. WORLD GLOBAL'S MCA AGREEMENTS

62. Answering Paragraph 62 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

63. Answering Paragraph 63 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

64. Answering Paragraph 64 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

65. Answering Paragraph 65 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

66. Answering Paragraph 66 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

67. Answering Paragraph 67 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

68. Answering Paragraph 68 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

69. Answering Paragraph 69 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

70. Answering Paragraph 70 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

71. Answering Paragraph 71 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

72. Answering Paragraph 72 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

73. Answering Paragraph 73 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

a. Terms of Defendants' MCA Agreements with LPG

74. Answering Paragraph 74 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

1 75. Answering Paragraph 75 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 76. Answering Paragraph 76 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 77. Answering Paragraph 77 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 78. Answering Paragraph 78 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 79. Answering Paragraph 79 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 80. Answering Paragraph 80 of the Complaint, Defendant lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 81. Answering Paragraph 81 of the Complaint, Defendant lacks sufficient information to
14 admit or deny the allegations in this paragraph and, on that basis, denies them.

15 82. Answering Paragraph 82 of the Complaint, Defendant lacks sufficient information to
16 admit or deny the allegations in this paragraph and, on that basis, denies them.

17 83. Answering Paragraph 83 of the Complaint, Defendant lacks sufficient information to
18 admit or deny the allegations in this paragraph and, on that basis, denies them.

19 84. Answering Paragraph 84 of the Complaint, Defendant lacks sufficient information to
20 admit or deny the allegations in this paragraph and, on that basis, denies them.

21 85. Answering Paragraph 85 of the Complaint, Defendant lacks sufficient information to
22 admit or deny the allegations in this paragraph and, on that basis, denies them.

23 86. Answering Paragraph 86 of the Complaint, Defendant lacks sufficient information to
24 admit or deny the allegations in this paragraph and, on that basis, denies them.

25 87. Answering Paragraph 87 of the Complaint, Defendant lacks sufficient information to
26 admit or deny the allegations in this paragraph and, on that basis, denies them.

b. Transfers to World Global Pursuant to MCA Agreements

88. Answering Paragraph 88 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

89. Answering Paragraph 89 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

90. Answering Paragraph 90 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

91. Answering Paragraph 91 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

92. Answering Paragraph 92 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

D. WORLD GLOBAL AS ACH PAYMENT PROCESSOR

93. Answering Paragraph 93 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

94. Answering Paragraph 94 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

95. Answering Paragraph 95 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

96. Answering Paragraph 96 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

97. Answering Paragraph 97 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

98. Answering Paragraph 98 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

99. Answering Paragraph 99 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

100. Answering Paragraph 100 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

1 101. Answering Paragraph 101 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 102. Answering Paragraph 102 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 103. Answering Paragraph 103 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 104. Answering Paragraph 104 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 105. Answering Paragraph 105 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 106. Answering Paragraph 106 of the Complaint, Defendant lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 107. Answering Paragraph 107 of the Complaint, Defendant lacks sufficient information to
14 admit or deny the allegations in this paragraph and, on that basis, denies them.

15 108. Answering Paragraph 108 of the Complaint, Defendant lacks sufficient information to
16 admit or deny the allegations in this paragraph and, on that basis, denies them.

17 109. Answering Paragraph 109 of the Complaint, Defendant lacks sufficient information to
18 admit or deny the allegations in this paragraph and, on that basis, denies them.

19 110. Answering Paragraph 110 of the Complaint, Defendant lacks sufficient information to
20 admit or deny the allegations in this paragraph and, on that basis, denies them.

21 111. Answering Paragraph 111 of the Complaint, Defendant lacks sufficient information to
22 admit or deny the allegations in this paragraph and, on that basis, denies them.

23 112. Answering Paragraph 112 of the Complaint, Defendant lacks sufficient information to
24 admit or deny the allegations in this paragraph and, on that basis, denies them.

25 113. Answering Paragraph 113 of the Complaint, Defendant lacks sufficient information to
26 admit or deny the allegations in this paragraph and, on that basis, denies them.

27 114. Answering Paragraph 114 of the Complaint, Defendant lacks sufficient information to
28 admit or deny the allegations in this paragraph and, on that basis, denies them.

1 115. Answering Paragraph 115 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 116. Answering Paragraph 116 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 117. Answering Paragraph 117 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 118. Answering Paragraph 118 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 119. Answering Paragraph 119 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 120. Answering Paragraph 120 of the Complaint, Defendant lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 121. Answering Paragraph 121 of the Complaint, Defendant lacks sufficient information to
14 admit or deny the allegations in this paragraph and, on that basis, denies them.

15 **E. DEMBITZER AND FEIG'S PERSONAL INVOLVEMENT**

16 122. Answering Paragraph 122 of the Complaint, Defendant lacks sufficient information to
17 admit or deny the allegations in this paragraph and, on that basis, denies them.

18 123. Answering Paragraph 123 of the Complaint, Defendant lacks sufficient information to
19 admit or deny the allegations in this paragraph and, on that basis, denies them.

20 124. Answering Paragraph 124 of the Complaint, Defendant lacks sufficient information to
21 admit or deny the allegations in this paragraph and, on that basis, denies them.

22 125. Answering Paragraph 125 of the Complaint, Defendant lacks sufficient information to
23 admit or deny the allegations in this paragraph and, on that basis, denies them.

24 126. Answering Paragraph 126 of the Complaint, Defendant lacks sufficient information to
25 admit or deny the allegations in this paragraph and, on that basis, denies them.

26 127. Answering Paragraph 127 of the Complaint, Defendant lacks sufficient information to
27 admit or deny the allegations in this paragraph and, on that basis, denies them.
28

1 128. Answering Paragraph 128 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 129. Answering Paragraph 129 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 130. Answering Paragraph 130 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 131. Answering Paragraph 131 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 132. Answering Paragraph 132 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 133. Answering Paragraph 133 of the Complaint, Defendant lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 134. Answering Paragraph 134 of the Complaint, Defendant lacks sufficient information to
14 admit or deny the allegations in this paragraph and, on that basis, denies them.

15 135. Answering Paragraph 135 of the Complaint, Defendant denies that it is an alter ego of
16 Dembitzer and World Global. Defendant further denies that it received, holds, or otherwise
17 benefitted from monies that allegedly were wrongfully taken by Dembitzer, Feig, and World Global
18 as part of the alleged Ponzi scheme. Defendant lacks sufficient information to admit or deny the
19 remaining allegations in this paragraph and, on that basis, denies them.

20 136. Answering Paragraph 136 of the Complaint, Defendant denies that it is an alter ego of
21 Dembitzer or World Global. Defendant denies that it is a shell entity set up by Dembitzer to escape
22 creditors. Defendant lacks sufficient information to admit or deny the remaining allegations in this
23 paragraph and, on that basis, denies them.

24 137. Answering Paragraph 137 of the Complaint, Defendant denies that it is an alter ego of
25 Dembitzer or World Global. Defendant denies it received monies transferred by World Global.
26 Defendant lacks sufficient information to admit or deny the remaining allegations in this paragraph
27 and, on that basis, denies them
28

1 138. Answering Paragraph 138 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 139. Answering Paragraph 139 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 140. Answering Paragraph 140 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 141. Answering Paragraph 141 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 **F. GUBIN AND OPTIMUM'S PARTICIPATION**

10 142. Answering Paragraph 142 of the Complaint, Defendant denies that Dembitzer owns
11 it. Defendant lacks sufficient information to admit or deny the remaining allegations in this paragraph
12 and, on that basis, denies them.

13 143. Answering Paragraph 143 of the Complaint, Defendant lacks sufficient information to
14 admit or deny the allegations in this paragraph and, on that basis, denies them.

15 144. Answering Paragraph 144 of the Complaint, Defendant lacks sufficient information to
16 admit or deny the allegations in this paragraph and, on that basis, denies them.

17 145. Answering Paragraph 145 of the Complaint, Defendant lacks sufficient information to
18 admit or deny the allegations in this paragraph and, on that basis, denies them.

19 146. Answering Paragraph 146 of the Complaint, Defendant lacks sufficient information to
20 admit or deny the allegations in this paragraph and, on that basis, denies them.

21 147. Answering Paragraph 147 of the Complaint, Defendant lacks sufficient information to
22 admit or deny the allegations in this paragraph and, on that basis, denies them.

23 148. Answering Paragraph 148 of the Complaint, Defendant lacks sufficient information to
24 admit or deny the allegations in this paragraph and, on that basis, denies them.

25 149. Answering Paragraph 149 of the Complaint, Defendant lacks sufficient information to
26 admit or deny the allegations in this paragraph and, on that basis, denies them.

27 150. Answering Paragraph 150 of the Complaint, Defendant denies that it is an alter ego of
28 Dembitzer or World Global. Defendant further denies that it is a shell company. Defendant lacks

1 sufficient information to admit or deny the remaining allegations in this paragraph and, on that basis,
2 denies them.

3 151. Answering Paragraph 151 of the Complaint, Defendant denies that it engaged in any
4 fraudulent activities, and otherwise lacks sufficient information to admit or deny the allegations in
5 this paragraph and, on that basis, denies them.

6 152. Answering Paragraph 152 of the Complaint, Defendant lacks sufficient information to
7 admit or deny the allegations in this paragraph and, on that basis, denies them.

8 153. Answering Paragraph 153 of the Complaint, Defendant lacks sufficient information to
9 admit or deny the allegations in this paragraph and, on that basis, denies them.

10 154. Answering Paragraph 154 of the Complaint, Defendant lacks sufficient information to
11 admit or deny the allegations in this paragraph and, on that basis, denies them.

12 155. Answering Paragraph 155 of the Complaint, Defendant lacks sufficient information to
13 admit or deny the allegations in this paragraph and, on that basis, denies them.

14 156. Answering Paragraph 156 of the Complaint, Defendant denies that it is an alter ego of
15 Dembitzer or World Global, or that it was involved in the opening of accounts by World Global,
16 Dembitzer, or Feig. Defendant lacks sufficient information to admit or deny the remaining
17 allegations in this paragraph and, on that basis, denies them

18 157. Answering Paragraph 157 of the Complaint, Defendant lacks sufficient information to
19 admit or deny the allegations in this paragraph and, on that basis, denies them.

20 158. Answering Paragraph 158 of the Complaint, Defendant lacks sufficient information to
21 admit or deny the allegations in this paragraph and, on that basis, denies them.

22 159. Answering Paragraph 159 of the Complaint, Defendant lacks sufficient information to
23 admit or deny the allegations in this paragraph and, on that basis, denies them.

24 160. Answering Paragraph 160 of the Complaint, Defendant denies that it engaged in any
25 fraudulent activity, and otherwise lacks sufficient information to admit or deny the allegations in this
26 paragraph and, on that basis, denies them.

27 161. Answering Paragraph 161 of the Complaint, Defendant lacks sufficient information to
28 admit or deny the allegations in this paragraph and, on that basis, denies them.

1 162. Answering Paragraph 162 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 163. Answering Paragraph 163 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 164. Answering Paragraph 164 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 165. Answering Paragraph 165 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 166. Answering Paragraph 166 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 167. Answering Paragraph 167 of the Complaint, Defendant lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 168. Answering Paragraph 168 of the Complaint, Defendant lacks sufficient information to
14 admit or deny the allegations in this paragraph and, on that basis, denies them.

15 169. Answering Paragraph 169 of the Complaint, Defendant lacks sufficient information to
16 admit or deny the allegations in this paragraph and, on that basis, denies them.

17 170. Answering Paragraph 170 of the Complaint, Defendant lacks sufficient information to
18 admit or deny the allegations in this paragraph and, on that basis, denies them.

19 171. Answering Paragraph 171 of the Complaint, Defendant lacks sufficient information to
20 admit or deny the allegations in this paragraph and, on that basis, denies them.

21 **G. DEFENDANT'S PONZI SCHEME**

22 172. Answering Paragraph 172 of the Complaint, Defendant lacks sufficient information to
23 admit or deny the allegations in this paragraph and, on that basis, denies them.

24 173. Answering Paragraph 173 of the Complaint, Defendant lacks sufficient information to
25 admit or deny the allegations in this paragraph and, on that basis, denies them.

26 174. Answering Paragraph 174 of the Complaint, Defendant lacks sufficient information to
27 admit or deny the allegations in this paragraph and, on that basis, denies them.
28

1 175. Answering Paragraph 175 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 176. Answering Paragraph 176 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 177. Answering Paragraph 177 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 **H. LPG'S PREPETITION CREDITORS**

8 178. Answering Paragraph 178 of the Complaint, Defendant lacks sufficient information to
9 admit or deny the allegations in this paragraph and, on that basis, denies them.

10 179. Answering Paragraph 179 of the Complaint, Defendant lacks sufficient information to
11 admit or deny the allegations in this paragraph and, on that basis, denies them.

12 180. Answering Paragraph 180 of the Complaint, Defendant lacks sufficient information to
13 admit or deny the allegations in this paragraph and, on that basis, denies them.

14 181. Answering Paragraph 181 of the Complaint, Defendant lacks sufficient information to
15 admit or deny the allegations in this paragraph and, on that basis, denies them.

16 182. Answering Paragraph 182 of the Complaint, Defendant lacks sufficient information to
17 admit or deny the allegations in this paragraph and, on that basis, denies them.

18 183. Answering Paragraph 183 of the Complaint, Defendant lacks sufficient information to
19 admit or deny the allegations in this paragraph and, on that basis, denies them.

20 184. Answering Paragraph 184 of the Complaint, Defendant lacks sufficient information to
21 admit or deny the allegations in this paragraph and, on that basis, denies them.

22 **FIRST CLAIM FOR RELIEF**

23 **Avoidance, Recovery, and Preservation of Two-Year Actual Fraudulent Transfers**

24 **[11 U.S.C. §§ 548(a)(1)(A), 550, and 551]**

25 185. The allegations of Paragraph 185 of the Complaint do not require an answer.

26 186. Answering Paragraph 186 of the Complaint, Defendant lacks sufficient information to
27 admit or deny the allegations in this paragraph and, on that basis, denies them.
28

1 187. Answering Paragraph 187 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 188. Answering Paragraph 188 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 189. Answering Paragraph 189 of the Complaint, Defendant lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 190. Answering Paragraph 190 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 191. Answering Paragraph 191 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 192. Answering Paragraph 192 of the Complaint, Defendant lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 193. Answering Paragraph 193 of the Complaint, Defendant denies that it is an alter ego of
14 Dembitzer or World Global. Defendant further denies that it was transferred LPG monies. Defendant
15 lacks sufficient information to admit or deny the remaining allegations in this paragraph and, on that
16 basis, denies them.

17 **SECOND CLAIM FOR RELIEF**

18 **Avoidance, Recovery, and Preservation of Two Year Constructive Fraudulent Transfers**

19 **[11 U.S.C. §§ 548(a)(1)(B), 550, and 551]**

20 194. The allegations of paragraph 194 of the Complaint do not require an answer.

21 195. Answering Paragraph 195 of the Complaint, Defendant lacks sufficient information to
22 admit or deny the allegations in this paragraph and, on that basis, denies them.

23 196. Answering Paragraph 196 of the Complaint, Defendant lacks sufficient information to
24 admit or deny the allegations in this paragraph and, on that basis, denies them.

25 197. Answering Paragraph 197 of the Complaint, Defendant lacks sufficient information to
26 admit or deny the allegations in this paragraph and, on that basis, denies them.

27 198. Answering Paragraph 198 of the Complaint, Defendant lacks sufficient information to
28 admit or deny the allegations in this paragraph and, on that basis, denies them.

1 199. Answering Paragraph 199 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 200. Answering Paragraph 200 of the Complaint, Defendant lacks sufficient information to
4 admit or deny the allegations in this paragraph and, on that basis, denies them.

5 201. Answering Paragraph 201 of the Complaint, Defendant denies that it is an alter ego of
6 Dembitzer or World Global. Defendant further denies that it was transferred LPG monies.
7 Defendant lacks sufficient information to admit or deny the remaining allegations in this paragraph
8 and, on that basis, denies them.

9 202. Answering Paragraph 202 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 **THIRD CLAIM FOR RELIEF**

12 **Demand for Accounting**

13 203. The allegations of Paragraph 203 of the Complaint do not require an answer.

14 204. Answering Paragraph 204 of the Complaint, Defendant lacks sufficient information to
15 admit or deny the allegations in this paragraph and, on that basis, denies them.

16 205. Answering Paragraph 205 of the Complaint, Defendant lacks sufficient information to
17 admit or deny the allegations in this paragraph and, on that basis, denies them.

18 206. Answering Paragraph 206 of the Complaint, Defendant lacks sufficient information to
19 admit or deny the allegations in this paragraph and, on that basis, denies them.

20 207. Answering Paragraph 207 of the Complaint, Defendant lacks sufficient information to
21 admit or deny the allegations in this paragraph and, on that basis, denies them.

22 208. Answering Paragraph 208 of the Complaint, Defendant lacks sufficient information to
23 admit or deny the allegations in this paragraph and, on that basis, denies them.

24 209. Answering Paragraph 209 of the Complaint, Defendant lacks sufficient information to
25 admit or deny the allegations in this paragraph and, on that basis, denies them.

26 210. Answering Paragraph 210 of the Complaint, Defendant denies that any basis exists for
27 the relief sought in this paragraph as to it, and otherwise lacks sufficient information to admit or
28 deny the allegations in this paragraph and, on that basis, denies them.

FOURTH CLAIM FOR RELIEF

Turnover of Estate Property

[11 U.S.C. § 542]

211. The allegations of Paragraph 211 of the Complaint do not require an answer.

212. Answering Paragraph 212 of the Complaint, Defendant denies the allegations in this paragraph to the extent they pertain to it, and otherwise lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

213. Answering Paragraph 213 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

214. Answering Paragraph 214 of the Complaint, Defendant denies that it is an alter ego of Dembitzer or World Global. Defendant further denies that it was set up to escape collection by LPG and its creditors. Defendant lacks sufficient information to admit or deny the remaining allegations in this paragraph and, on that basis, denies them.

215. Answering Paragraph 215 of the Complaint, Defendant denies that it is an alter ego of Dembitzer or World Global. Defendant further denies that it has ever shared offices with World Global, or that it has any relationship to any supposed Genesis entity in Wyoming. Defendant lacks sufficient information to admit or deny the remaining allegations in this paragraph and, on that basis, denies them.

216. Answering Paragraph 216 of the Complaint, Defendant denies that it is an alter ego of Dembitzer or World Global. Defendant further denies that it received funds from Dembitzer, Feig, or the alleged Dembitzer Alter Egos. Defendant lacks sufficient information to admit or deny the remaining allegations in this paragraph and, on that basis, denies them.

217. Answering Paragraph 217 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

218. Answering Paragraph 218 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

219. Answering Paragraph 219 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

FIFTH CLAIM FOR RELIEF

**Fraud and/or Conversion/Theft Committed by World Global, Dembitzer, Feig, the
Alter Egos, the Dembitzer Alter Egos – the Fraudulent ACH Transactions**

220. The allegations of Paragraph 220 of the Complaint do not require an answer.

221. Answering Paragraph 221 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

222. Answering Paragraph 222 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

223. Answering Paragraph 223 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

224. Answering Paragraph 224 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

225. Answering Paragraph 225 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

226. Answering Paragraph 226 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

227. Answering Paragraph 227 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

228. Answering Paragraph 228 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

229. Answering Paragraph 229 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

230. Answering Paragraph 230 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

231. Answering Paragraph 231 of the Complaint, Defendant denies that it is an alter ego of Dembitzer or World Global, or that it is liable to LPG for any purported fraudulent transactions or conversion of funds. Defendant lacks sufficient information to admit or deny the remaining allegations in this paragraph and, on that basis, denies them.

SIXTH CLAIM FOR RELIEF

**Fraud and/or Conversion/Theft Committed by World Global, Dembitzer, Feig, the Alter
Egos and the Dembitzer Alter Egos – Unreimbursed Funds from the MCA Agreements and
ACH Agreement**

232. The allegations of Paragraph 232 of the Complaint do not require an answer.

233. Answering Paragraph 233 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

234. Answering Paragraph 234 of the Complaint, Defendant denies that it is an alter ego of Dembitzer or World Global. Defendant denies that it received payments meant for LPG or “launder[ed] assets stripped from LPG.” Defendant lacks sufficient information to admit or deny the remaining allegations in this paragraph and, on that basis, denies them.

SEVENTH CLAIM FOR RELIEF

Aiding and Abetting Fraud and/or Conversion/Theft by Optimum and Gubin

235. The allegations of Paragraph 235 of the Complaint do not require an answer

236. Answering Paragraph 236 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

237. Answering Paragraph 237 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

238. Answering Paragraph 238 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

239. Answering Paragraph 239 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

240. Answering Paragraph 240 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

241. Answering Paragraph 241 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

242. Answering Paragraph 242 of the Complaint, Defendant lacks sufficient information to admit or deny the allegations in this paragraph and, on that basis, denies them.

1 243. Answering Paragraph 243 of the Complaint, Defendant lacks sufficient information to
2 admit or deny the allegations in this paragraph and, on that basis, denies them.

3 **EIGHTH CLAIM FOR RELIEF**

4 **Aiding and Abetting by Defendants Optimum and Gubin**

5 **[Cal. Civ. Code § 3439, et seq.]**

6 244. The allegations of Paragraph 244 of the Complaint do not require an answer.

7 245. Answering Paragraph 245 of the Complaint, Defendant lacks sufficient information to
8 admit or deny the allegations in this paragraph and, on that basis, denies them.

9 246. Answering Paragraph 246 of the Complaint, Defendant lacks sufficient information to
10 admit or deny the allegations in this paragraph and, on that basis, denies them.

11 247. Answering Paragraph 247 of the Complaint, Defendant lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 248. Answering Paragraph 248 of the Complaint, Defendant lacks sufficient information to
14 admit or deny the allegations in this paragraph and, on that basis, denies them.

15 249. Answering Paragraph 249 of the Complaint, Defendant lacks sufficient information to
16 admit or deny the allegations in this paragraph and, on that basis, denies them.

17 250. Answering Paragraph 250 of the Complaint, Defendant denies engaging in any
18 fraudulent conduct, and otherwise lacks sufficient information to admit or deny the allegations in
19 this paragraph and, on that basis, denies them.

20 **NINTH CLAIM FOR RELIEF**

21 **Conspiracy to Commit Fraud**

22 251. The allegations of Paragraph 251 of the Complaint do not require an answer.

23 252. Answering Paragraph 252 of the Complaint, Defendant denies engaging in or
24 conspiring with others to engage in any misconduct, and otherwise lacks sufficient information to
25 admit or deny the allegations in this paragraph and, on that basis, denies them.

26 253. Answering Paragraph 253 of the Complaint, Defendant denies engaging in or
27 conspiring with others to engage in any misconduct, and otherwise lacks sufficient information to
28 admit or deny the allegations in this paragraph and, on that basis, denies them.

1 254. Answering Paragraph 254 of the Complaint, Defendant denies engaging in or
2 conspiring with others to engage in any misconduct, and otherwise lacks sufficient information to
3 admit or deny the allegations in this paragraph and, on that basis, denies them.

4 255. Answering Paragraph 255 of the Complaint, Defendant denies engaging in or
5 conspiring with others to engage in any misconduct, and otherwise lacks sufficient information to
6 admit or deny the allegations in this paragraph and, on that basis, denies them.

7 256. Answering Paragraph 256 of the Complaint, Defendant denies engaging in or
8 conspiring with others to engage in any misconduct, and otherwise lacks sufficient information to
9 admit or deny the allegations in this paragraph and, on that basis, denies them.

10 257. Answering Paragraph 257 of the Complaint, Defendant denies engaging in or
11 conspiring with others to engage in any misconduct, and otherwise lacks sufficient information to
12 admit or deny the allegations in this paragraph and, on that basis, denies them.

13 **RESERVATION OF RIGHTS AND PRAYER FOR RELIEF**

14 258. The remainder of the Complaint contains a “Reservation of Rights” and “Prayer for
15 Relief” to which no response is required. However, to the extent a response is, in fact, required,
16 Defendant denies that Plaintiff has any viable claims or causes of action against it (whether asserted
17 or unasserted) or that Plaintiff is entitled to any relief against it (whether included in the “Prayer for
18 Relief” or otherwise).

19 **FIRST AFFIRMATIVE DEFENSE**

20 **(Bad Faith)**

21 259. For a separate and first affirmative defense to the Complaint, and to each and every
22 purported claim for relief against Defendant contained therein, Defendant alleges that Plaintiff failed
23 to conduct adequate investigation in naming Defendant as a party, and commenced this action in bad
24 faith against Defendant.

SECOND AFFIRMATIVE DEFENSE

(Lack of Personal Jurisdiction)

260. For a separate and second affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that the Court lacks personal jurisdiction over Defendant.

THIRD AFFIRMATIVE DEFENSE

(Improper Venue)

261. For a separate and third affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that venue is improper as to Defendant.

FOURTH AFFIRMATIVE DEFENSE

(Failure to State a Claim)

262. For a separate and fourth affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that the Complaint fails to state a claim upon which relief can be granted against Defendant.

FIFTH AFFIRMATIVE DEFENSE

(Estoppel)

263. For a separate and fifth affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that Plaintiff's claims are barred by the doctrine of estoppel.

SIXTH AFFIRMATIVE DEFENSE

(Laches)

264. For a separate and sixth affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that Plaintiff's claims are barred by the doctrine of laches.

SEVENTH AFFIRMATIVE DEFENSE

(Waiver)

265. For a separate and seventh affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that Plaintiff's claims are barred by the doctrine of waiver.

EIGHTH AFFIRMATIVE DEFENSE

(Unclean Hands)

266. For a separate and eighth affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that Plaintiff's claims are barred by the doctrine of unclean hands.

NINTH AFFIRMATIVE DEFENSE

(Unconscionability)

267. For a separate and ninth affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that Plaintiff's claims are barred by the doctrine of unconscionability.

TENTH AFFIRMATIVE DEFENSE

(Equity)

268. For a separate and tenth affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that Plaintiff's claims are barred by common law and/or principles of equity.

ELEVENTH AFFIRMATIVE DEFENSE

(Debtor's Own Conduct)

269. For a separate and eleventh affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that Plaintiff's damages, if any, were the direct and proximate result of the debtor's own conduct.

TWELFTH AFFIRMATIVE DEFENSE

(Unrelated, Pre-Existing, or Subsequent Conditions

Unrelated to Defendant's Conduct)

270. For a separate and twelfth affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that Plaintiff's

1 damages, if any, were the result of unrelated, pre-existing, or subsequent events unrelated to
2 Defendant's conduct.

3 **THIRTEENTH AFFIRMATIVE DEFENSE**

4 **(Failure to Mitigate Damages)**

5 271. For a separate and thirteenth affirmative defense to the Complaint, and to each and
6 every purported claim for relief against Defendant contained therein, Defendant alleges that
7 Plaintiff's damages, if any, were the result of the debtor's failure to mitigate damages.

8 **FOURTEENTH AFFIRMATIVE DEFENSE**

9 **(Accord and Satisfaction)**

10 272. For a separate and fourteenth affirmative defense to the Complaint, and to each and
11 every purported claim for relief against Defendant contained therein, Defendant alleges that
12 Plaintiff's damages, if any, must be reduced by the amount of any payments made to Plaintiff and/or
13 the debtor by any collateral sources, including to the extent the debtor has released, settled, entered
14 into an accord and satisfaction, or otherwise compromised its claims by any means.

15 **FIFTEENTH AFFIRMATIVE DEFENSE**

16 **(Adequate Remedy At Law)**

17 273. For a separate and fifteenth affirmative defense to the Complaint, and to each and
18 every purported claim for relief against Defendant contained therein based in equity, Defendant
19 alleges that Plaintiff has an adequate remedy at law.

20 **SIXTEENTH AFFIRMATIVE DEFENSE**

21 **(Statutory Compliance)**

22 274. For a separate and sixteenth affirmative defense to the Complaint, and to each and
23 every purported claim for relief against Defendant contained therein, Defendant alleges that, at all
24 times mentioned in the Complaint, Defendant acted in strict compliance with applicable state and
25 federal law.

26 **SEVENTEENTH AFFIRMATIVE DEFENSE**

27 **(Good Faith of Defendants)**

275. For a separate and seventeenth affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant alleges that, at all times mentioned in the Complaint, it acted in good faith and without knowledge of the voidability of the transfers and in compliance with title 11 of the United States Code including, without limitation, 11 U.S.C. § 550 and applicable state law.

EIGHTEENTH AFFIRMATIVE DEFENSE

(Right to Assert Affirmative Defenses)

276. For a separate and eighteenth affirmative defense to the Complaint, and to each and every purported claim for relief against Defendant contained therein, Defendant reserves the right to assert additional affirmative defenses based upon further investigation and discovery.

DEMAND FOR JURY TRIAL

Defendant hereby demands a trial by jury on all issues triable by a jury and does not consent to jury trial conducted by the bankruptcy court.

WHEREFORE, Defendant prays for judgment as follows:

1. That Plaintiff take nothing by the Complaint;
2. That Plaintiff be denied all relief sought;
3. For costs of suit herein; and
4. For such other and further relief as this Court deems just and proper.

Dated: April 28, 2025

LONDON & NAOR P.C.



By: MICHAEL A. LUNDHOLM

Attorneys for Defendant
GENESIS EQUITY GROUP
FUNDING LLC